



Most scientists regarded the new streamlined peer-review process as 'quite an improvement.'



Navigating the Bank Review Process in MN

- **Know the players**
- **Consider the reviewer's perspective**
- **Be efficient in your communication**



**US Army Corps
of Engineers®**

~ 15 project managers



~ 350 local authorities



~ 12 wetland specialists



On any one project

- Corps PM
 - Corps Ecologist
 - BWSR Wetland Spec.
 - LGU rep
 - SWCD rep
- BWSR Central Office
 - EPA rep
 - DNR rep
 - USFWS rep
 - Corps Banking Coord

Lots of Cooks in the Kitchen

Advantages:

- Different perspectives
- More thorough review
- Meets intent of rules



Disadvantages:

- Too many comments
- Conflicting comments
- Who decides?



Decision Points



- Sign MBI? – **Corps PM & Section Chief**
- WCA Banking Plan approval? – **LGU** (based on TEP recommendation)
- Will State accept easement? – **BWSR Central Office**

Remember that reviewers:

- Are human.
- Not experts in everything.
- Try to be consistent, fair & uphold the rules.
- Have a work and home life outside of your bank proposal.



It is likely that you will get:

Many comments from many different folks at different times. Some verbal, some written.





What not to do

- **DO NOT** respond to each comment as they come in.
- **DO NOT** assume that everyone has read everyone else's comments.
- **DO NOT** become defensive.
- **DO NOT** be dismissive.



A better approach:

Communicate with Corps PM, LGU and BWSR.

- **Where are we at in the review process?**
- **Is this comment IRT, TEP, both?**
- **When and how would you like me to respond?**



Options to address comments/questions:

- **Revise entire plan.**
- **Provide addendum to replace certain sections of the plan.**
- **Comment /response document.**



Which option? It depends

- Just additional documentation/info - addendum
- Changes to plan needed – revised plan
- It is always good to provide a comment/response document to demonstrate that you have addressed them in the plan or if you want to make sure they are acceptable before revising the plan.



Remember: If it is not written down in your plan, it did not happen.

- **Your plan is approved, not the TEP meeting.**
- **Your plan must match the MBI.**
- **The “TEP said it was okay” does not cut it.**



Your Bank Plan should:

- **Meet rule requirements.**
- **Be technically sound.**
- **Effectively communicate site conditions, proposed actions, anticipated outcomes.**



The goal is to communicate & document, not just check the box

- Explain your project and avoid “canned” language.
- Pretend reviewers have never seen the site and don’t know the area.
- Be specific, not general.





Examples

“The project will increase floodwater storage.”

“The project is located in the floodplain of the Fox River and will be able to retain floodwaters for a longer duration due to the disabling of the drainage ditch that currently removes surface water more rapidly after flooding events.”



Examples

“The project will increase wildlife habitat.”

“The project will restore hydrology and vegetation to a prairie pothole basin with adjacent grassland buffer. This will provide a stopover area for migrating waterfowl, potential waterfowl nesting habitat and a local food source for grassland birds and mammals .”



Realities of the Banking System

- It is a complicated process
- There are many people involved
- The application process is as variable as the people involved.
- Magic formula for approval? – clarity and communication.